

Message

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**From:** Blakley, Pamela [blakley.pamela@epa.gov]  
**Sent:** 9/20/2018 10:17:50 PM  
**To:** Sullivan, Jim (MPCA) [jim.sullivan@state.mn.us]  
**CC:** Robinson, Randall [robinson.randall@epa.gov]; Brown, David L (MPCA) [david.l.brown@state.mn.us]  
**Subject:** RE: Call to talk about USG Interiors

Very Good.

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**From:** Sullivan, Jim (MPCA) [mailto:jim.sullivan@state.mn.us]  
**Sent:** Thursday, September 20, 2018 5:14 PM  
**To:** Blakley, Pamela <blakley.pamela@epa.gov>  
**Cc:** Robinson, Randall <robinson.randall@epa.gov>; Brown, David L (MPCA) <david.l.brown@state.mn.us>  
**Subject:** RE: Call to talk about USG Interiors

Next Thursday at 10am works best for us.

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**From:** Blakley, Pamela <blakley.pamela@epa.gov>  
**Sent:** Thursday, September 20, 2018 3:41 PM  
**To:** Sullivan, Jim (MPCA) <jim.sullivan@state.mn.us>  
**Cc:** Robinson, Randall <robinson.randall@epa.gov>; Brown, David L (MPCA) <david.l.brown@state.mn.us>  
**Subject:** RE: Call to talk about USG Interiors

Thanks. Tuesday or Thursday after 10am works best on our end.

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**From:** Sullivan, Jim (MPCA) [mailto:jim.sullivan@state.mn.us]  
**Sent:** Thursday, September 20, 2018 3:30 PM  
**To:** Blakley, Pamela <blakley.pamela@epa.gov>  
**Cc:** Robinson, Randall <robinson.randall@epa.gov>; Brown, David L (MPCA) <david.l.brown@state.mn.us>  
**Subject:** RE: Call to talk about USG Interiors

Hello Pam,

Thank you for the note. David did brief me on the project. We could do a conference call next week if you have time available. Send us some dates and times that you are available and we can coordinate a call.

-jim

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**From:** Blakley, Pamela <blakley.pamela@epa.gov>  
**Sent:** Thursday, September 20, 2018 3:28 PM  
**To:** Sullivan, Jim (MPCA) <jim.sullivan@state.mn.us>  
**Cc:** Robinson, Randall <robinson.randall@epa.gov>; Brown, David L (MPCA) <david.l.brown@state.mn.us>  
**Subject:** Call to talk about USG Interiors

Good Afternoon Jim,

As you know, USG Interiors, located in Red Wing, MN, has been the subject of an enforcement action here in Region 5. A significant part of the action involves air quality modeling of potential 1-hr SO<sub>2</sub> NAAQS violations. The company has responded to Region 5 with AERMOD modeling of their own. However, earlier this year, they announced they were moving forward using CTDMPlus to model their facility. We sent the company a letter in April stating we felt AERMOD

was the most appropriate model for use in this area. In May, they provided a protocol, including their justification for the use of CTDMPlus. We've had a number of discussions with OAQPS and ORD. While no final decisions have been made, we are not sure we can preclude their use of the model, largely based on its inclusion in Appendix A of our Air Quality Modeling Guideline and the meteorological data available for use. While this is currently an enforcement case, future permit modeling may be required as well as a potential request for redesignation from 1-hr SO2 unclassifiable to attainment/unclassifiable. Both of these actions would involve MPCA.

Before we move forward we'd like to talk with you and David about this and any concerns you may have with our recommendation, preferably in the next week. You can either respond to this email or call me at 312-886-4447. Thanks

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